

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
MEMPHIS DIVISION**

In re:

**BANKRUPTCY
CASE NO. 15-28912**

Kathleen Diane Young
Debtor

Rushmore Loan Management
Services, LLC
Respondent

CHAPTER 13

Kathleen Diane Young
Sylvia F. Brown, Trustee
Respondents

OBJECTION TO CONFIRMATION

COMES NOW, Rushmore Loan Management Services, LLC, and makes and files its Objection to the Confirmation of the Debtor's Chapter 13 plan for the reasons set forth below:

1.

Rushmore Loan Management Services, LLC holds a first priority deed of trust on the Debtor's residence at 2670 Kate Bond Road, Memphis, Tennessee 38133.

2.

The Debtor's plan states arrearage owed to Rushmore Loan Management Services, LLC at \$70,000.00.

3.

Rushmore Loan Management Services, LLC's arrearage through date of filing is \$83,137.79.

4.

The Debtor's plan is inaccurate and does not provide Rushmore Loan Management Services, LLC with adequate protection.

THEREFORE, based upon the above and foregoing facts, Rushmore Loan Management Services, LLC objects to the Confirmation of the Debtor's Chapter 13 Plan.

This the 5th day of October, 2015

Respectfully Submitted

/s/Richard B. Maner

Richard B. Maner, TBN 024019
Attorney for Rushmore Loan Management
Services, LLC
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CERTIFICATE OF SERVICE

This is to certify that I have served a copy of **OBJECTION TO CONFIRMATION** electronically. Those not served electronically have been served by depositing same in the United States Mail in a properly addressed envelope to each with adequate postage thereon as follows:

Kathleen Diane Young
2670 Kate Bond Road
Memphis, TN 38133

Brian Lynn
67 Madison Avenue
Suite 714
Memphis, TN 38103

Sylvia F. Brown
200 Jefferson Avenue., Suite 1113
Memphis, TN 38103

This the 5th day of October, 2015

Respectfully Submitted

/s/Richard B. Maner

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